

**DECLARATION OF
VIOLA TREBICKA
ISO GOOGLE LLC'S
RESPONSE TO THE
COURT'S 10/27/22
ORDER TO SHOW
CAUSE (DKT. 784)**

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (CA Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF GOOGLE LLC'S
RESPONSE TO THE COURT'S
OCTOBER 27, 2022 ORDER TO SHOW
CAUSE (DKT. 784)**

Referral: Hon. Susan van Keulen, USMJ

San Jose Courthouse, Courtroom 6 – 4th Floor
Date: March 2, 2023
Time: 10:00 am

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit
4 this declaration in support of Google LLC’s Response to the Court’s October 27, 2022 Order to Show
5 Cause (Dkt. 784). I make this declaration of my own personal, firsthand knowledge, and if called
6 and sworn as a witness, I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant’s Responses
8 and Objections to Plaintiffs’ First Set of Requests for Admission (Nos. 1-11), dated November 6,
9 2020.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the transcript
11 of the Rule 30(b)(6) deposition of Glenn Berntson taken on June 16, 2021.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the transcript
13 of deposition of Rory McClelland taken on February 18, 2022.

14 5. On May 31, 2022, Google provided Plaintiffs with a declaration of Martin Šrámek
15 concerning his ongoing investigation into Incognito-detection bits in Google’s logs. That declaration
16 is located at Dkt. 614-3. At that time, Plaintiffs did not object to the declaration, the fact that Mr.
17 Šrámek’s investigation was ongoing, or that Mr. Šrámek reserved the right to “supplement [his]
18 attestation with any additional finding resulting from” the completion of his investigation.

19
20 I declare under penalty of perjury of the laws of the United States that the foregoing is true
21 and correct. Executed in Los Angeles, California on November 30, 2022.

22
23
24 By /s/ Viola Trebicka
Viola Trebicka